IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MARTIN J. WALSH, SECRETARY OF LABOR, UNITED STATES DEPARTMENT OF LABOR, Plaintiff, v. INTRA-NATIONAL HOME CARE, LLC, AND DILLI ADHIKARI Defendants.	))))))) Civil Action No. 2:21-cv-1391)))))))

SECRETARY OF LABOR'S MOTION
TO EXTEND THE DISCOVERY DEADLINE

Plaintiff, the Secretary of Labor, U.S. Department of Labor, though his undersigned attorneys, files this motion to extend the close of discovery to December 16, 2022. Discovery is currently scheduled to close on November 29, 2022. (Order of May 18, 2022, ECF 33). The purpose of this Motion is not to cause prejudice or undue delay, but rather to provide sufficient time for the parties to conclude depositions and any other remaining discovery. The requested extension would not affect any other dates in the current schedule (*Id.*). Plaintiff's counsel has discussed this Motion with Defendants' counsel, who oppose the Motion because they would prefer an even longer extension of the discovery deadline.

WHEREFORE the Secretary respectfully requests that this Honorable Court grant this Motion be GRANTED.

Respectfully submitted,

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Date: October 3, 2022

Solicitor of Labor

Oscar L. Hampton III
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/s/ Andrea Luby
By: Andrea Luby
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on October 3, 2022, I electronically filed the foregoing *Plaintiff's*

Unopposed Motion to Extend the Time to Respond to Defendant's Counterclaim with the

Clerk of Court by using the CM/ECF system, which will provide notice and an electronic link

to this document to the following attorneys of record:

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/s/ Andrea Luby

By: Andrea Luby